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March 28, 2024

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Nina Agdal v. Dillon Danis*, 23-CV-16873 (MCA)(MAH)**

Dear Judge Hammer:

This firm represents Plaintiff Nina Agdal in the above-referenced matter. I am writing to request a 90-day extension of all upcoming dates in the Pretrial Scheduling Order (ECF No. 33). Defendant consents to this request. This is the parties' first request for an extension of the discovery schedule.

The parties seek additional time to complete fact discovery. Pursuant to the current Pretrial Scheduling Order, the parties exchanged written discovery requests and responses but have yet to complete their collection and review of responsive documents to produce to one another. There also is some outstanding written discovery. Plaintiff also is waiting for responses to several non-party subpoenas that were served. With respect to the subpoena served on non-party Joshua Wander (concerning which Your Honor held a telephone conference on February 16, 2024), following a motion to compel that Plaintiff filed in the United States District Court for the Southern District of Florida, the court recently compelled Mr. Wander's deposition, which has yet to be scheduled. Accordingly, while the parties actively have engaged in discovery, the parties agree additional time is needed to complete outstanding discovery items.

If Your Honor agrees with this request, kindly execute the enclosed proposed Amended Pretrial Scheduling Order and direct the Clerk's Office to enter it on the docket. We are emailing a copy of this letter and a Word version of the proposed order to Your Honor's chambers so Your Honor can easily make any changes or additions.

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Thank You for Your Honor's consideration.

Respectfully submitted,

/s/ Joseph B. Shumofsky

Joseph B. Shumofsky

Encl.

cc: Mark A. Berman, Counsel for Defendant Dillon Danis (via ECF)